

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

Date: 10/26/2020

Time: 10:00 AM

IN RE:

Shane Christopher Buczek

Debtor.

Chapter: 13

Case No. 1-19-11441-CLB

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that upon the annexed application of KeyBank National Association., ("Movant"), Secured Creditor, by its attorneys, Fein Such & Crane, LLP., the undersigned will move before the Honorable Carl L. Bucki, United States Bankruptcy Judge, at the United States Bankruptcy Court, Western District of New York, Robert H. Jackson U.S. Courthouse, 2 Niagara Square, Orleans Courtroom, Buffalo, NY 14202, on October 26, 2020, at 10:00 in the forenoon of that day, or as soon thereafter as counsel can be heard for (1) sanctioning the debtor, pursuant to Fed. R. Bankr. Pro. 9011(c) for debtor's continued vexatious and abusive filings; 2) enjoining debtor from filing or causing to file any other papers in this Court that seek relief against or based upon a mortgage currently held by movant; and (3) further relief as to the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that on March 5, 2020, this Court shortened "the time requirement for future motions seeking sanctions against the debtor" under Rule 9011(c) from 21 days to 7 days. See Dkt. No. 236.

Dated: October 12, 2020

FEIN, SUCH & CRANE, LLP
Attorneys for Movant

By: 

David P. Case
(DC-1001)

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To: Shane Christopher Buczek
Albert J. Mogavero.
U.S. Trustee